

## ***Section 4 – Financial Management***

The objective of the Financial Management Section of the Weatherization Operations Manual is to outline the fiscal policy used by DED/DE in the management of the Low Income Weatherization Assistance Program formula grant. The requirements are as follows:

### **I. Budget Submission and Revision**

#### **A. Submission**

##### **1. Budgets** (See Attachment 4-1 for budgeting instructions)

Prior to awarding a subgrant, the following documentation must be submitted to the DED/DE through MoWAP:

- Detailed budget.
- Production services goals.
- Personnel descriptions with percent of position that is being funded through the grant.
- Cost Allocation Plan
- Indirect rate negotiation information (if applicable).
- Proof of liability and pollution occurrence insurance.

##### **DOE subgrants require the following additional documentation:**

- Leveraging Plan - The subgrantee is required to submit a plan documenting how Leveraging funds will be managed. Approval of the Leveraging Plan is required prior to incurring costs in this budget category. The Leveraging Plan will include, but is not limited to, specific planned activities; targeted partners (e.g. landlords, utility, other agencies); and estimated outcomes, including dollar amounts.
- Training and Technical Assistance (T&TA) Plan - The subgrantee is required to submit a plan documenting how T&TA funds will be managed. Approval of the T&TA Plan is required prior to incurring costs in this budget category. The T&TA Plan will include, but is not limited to, agency-specific priorities for training and technical assistance (e.g. major turnover of energy auditors will require investment in basic weatherization training, blower doors, heating systems, the National Energy Audit Tool (NEAT) and the Mobile Home Energy Audit (MHEA)).

##### **2. Revisions**

Budget revisions, as explained in 2 CFR 200, paragraph 200.308, must be submitted to DED/DE through MoWAP. 2 CFR 200.308 details the circumstances that require budget revisions and when prior approval is required. Changes in the production schedule are considered as changes in the scope of work and require approval by DED/DE.

## B. Budget Categories

### 1. Administrative Funds

- Allocation: Each program year, DED/DE allocates five percent (5%) of new funding to be allocated as administrative funds to the WAP agencies using the funding formula. A subgrantee allocated less than \$350,000 in total WAP funds may request up to an additional five percent (5%) in administrative funds. However, the additional funds are not in addition to the base grant, but will be taken from the program operations category. To qualify for increasing the administrative funds, the subgrantee must justify its need. The following items will be considered: (1) an approved indirect rate, (2) previous year expenditure for the WAP and (3) the planned purchase of equipment to manage the WAP.
- Carryover: DED/DE will authorize WAP agencies to carry over administrative funds in an amount equal to a subgrantee's unspent administrative funds from the previous program year providing the rate of administrative expenditures to total expenditures is not greater than the amount allowed in the budget section of the grant award. Discrepancies between the financial audit and reported expenditures will be adjusted in the next supplemental or regular budget period.
- Total Administrative Budget: The total administrative budget is the sum of the new administrative funding allocated under the base grant, the amount of administrative funds carried over from the previous year and any increase approved as outlined above.
- Administrative Restrictions:
  - a) The WAP portion of the agency's single audit costs are not to be included as an administrative expense unless financial audit costs are included in the indirect cost pool of a negotiated approved, indirect cost rate. This expense is to be budgeted in the "Financial Audit" budget category.
  - b) Non-administrative carryover funds may not be converted to the administration funds category.
  - c) If a subgrantee's expended administration funds exceed twenty percent (20%) of total WAP expenses at the end of any reporting period, DED/DE may require written justification from the subgrantee.

### 2. Insurance

All subgrantees must secure appropriate insurance coverage for their agency and their weatherization personnel. All insurance must be procured by the competitive bid process and must include these types:

- **Vehicular/Equipment Insurance** to protect program property from damage and loss. All vehicles (and equipment where appropriate) must have personal and property liability insurance.\*

- **Liability Insurance** for agency coverage, and for personnel who perform on-site work and pre- and post-inspections. Both personal injury and property damage, and completed product liability insurance must be included in this policy.\*\*
- **Pollution Occurrence Insurance (POI)** is required to be carried by each subgrantee. (See the federal LIWAP website at [www.waptac.org](http://www.waptac.org) for additional information.)\*\*
- **Property Insurance** to cover all weatherization materials and tools owned by the program from damage and loss.
- **Workers' Compensation Insurance** is required to be carried by each subgrantee.

**Vehicular/equipment insurance and property insurance are Program Operations items and must be budgeted accordingly.**

**\* Should the cost of the insurance exceed the value of the vehicle or equipment, replacement coverage need not be carried.**

**\*\* Liability and POI insurance is to be recorded in the Insurance budget category.**

### **3. Financial Audit**

Section 440.23 of the federal program regulations permits a separate budget category for financial audits. Unless financial audit costs are included in the indirect cost pool of a negotiated, approved, indirect cost rate, it is recommended to budget that expense in the "Financial Audit" budget category. This will help to not over-burden the limited administrative cost category.

### **4. Leveraging**

Subgrantees may budget up to, but no more than, five percent (5%) of their grant allocation for leveraging activities. A leveraging plan is required to be submitted with each budget. Leveraging activities include paying for agency staff or hiring consultant staff to explore and develop partnerships with property owners, utility companies and other entities that generate non-Federal resources for the program. Other allowable activities include: holding leveraging meetings; preparing technical materials/briefs or facilitating voluntary match funds from a non-Federal source. The leveraged resources should expand energy efficiency services and/or increase the number of DOE-eligible dwelling units weatherized. The work done with leveraged resources must be consistent with an approved energy audit and utilize cost-effective measures. Leveraging efforts will not always be successful, but subgrantees should aim to produce more than one dollar leveraged for each DOE dollar expended.

Utility funds for weatherization obtained by the DED/DE through utility regulatory cases or other actions may not be reported by subgrantees as leveraged funds.

## **5. Training and Technical Assistance (T&TA)**

Expenses charged to this category are used to fund training to support weatherization activities, subject to restrictions found in 2 CFR 200 and DOE program guidance. A T&TA plan is required to be submitted with each annual budget. T&TA activities are intended to maintain or increase the efficiency, quality and effectiveness of the Weatherization Assistance Program at all levels. Such activities should be designed to maximize energy savings, minimize production costs, improve program management and crew/contractor "quality of work", and reduce the potential for waste, fraud and mismanagement.

## **6. Program Operations**

Program Operations is defined as all expenses that directly support low-income weatherization operations. These include, but are not limited to, support (personnel and other expenses), labor, materials directly related to weatherizing homes, vehicle and property insurance, telephone and office supply expenses not allocated as administrative expenses under the agency cost-allocation plan and rental of office space.

## **C. Carryover Restrictions**

Administrative, Leveraging and T&TA funds may be carried over in their respective categories or converted into Program Operations.

Program Operations funds may be carried over, but shall not be converted to Administrative, Leveraging or T&TA funds.

Federal WAP funds not spent by the end of a program year may be recaptured. However, fifteen percent (15%) of total WAP subgrant funds may be carried forward. If a subgrantee determines the need to carry over monies in excess of fifteen percent (15%) of grant funds, approval must be obtained from the State. Before state approval may be granted, a detailed request that explains the necessity of the carry over funds and the circumstances that caused the subgrantee to carry over an amount greater than fifteen percent (15%) must be submitted. The request should also describe the corrective measures that will be taken to ensure that carry over funds will not exceed fifteen percent (15%) in the following year and have assurances that WAP clients have not or will not be deprived of WAP services. Funds in excess of fifteen percent (15%) of the base subgrant may be redistributed as determined by the State.

Carryover funding will not be allowed at the end of a federal grant cycle. All unexpended funds may be lapsed.

## **D. Cost Limits**

### **1. Average Cost Per Home**

DOE establishes a national average expenditure limit per home each program year. This average is identified in the State WAP plan and can also be found on the federal LIWAP website at [www.waptac.org](http://www.waptac.org).

DED/DE reserves the right to approve or reject certain costs as allowed expenditures.

Costs for program operations that exceed the established annual average cost per home, as specified in 10 CFR 440 paragraph 440.18(b), may be repaid to DED/DE if the statewide average is more than the amount specified in 10 CFR 440.

At the close of the program year, if the statewide average is less than the maximum allowed by program rule, but a subgrantee's average is above the maximum, DED/DE reserves the right to recapture excess expenditures. Subgrantees may submit a request for waiver to DED/DE attention: "Weatherization Program Director and Administrator."

During the program year, if DED/DE determines that the average cost per home will exceed the maximum allowable annual average cost per home, additional cost restrictions may be imposed. Implementation of these limits will be based on data gathered by the State regarding actual cost averages and may be imposed on one or all subgrantees as needed. The State will notify the subgrantee of the cost restrictions to be implemented and procedures for implementing the restrictions. Upon receipt of such notification, the subgrantee will be required to implement this procedure for all homes for which materials have not been ordered or for which a job order has not been issued to a contractor.

## **2. Multi-Family Dwellings**

When WAP services are provided for multi-family dwellings, the following guidance applies:

- a) Single-family unit costs limitations apply.
- b) Total cost may not exceed the maximum cost allowance multiplied by the total number of eligible units.

## **3. Incidental Repair Cost Limits**

All incidental repairs must be justified in the client file with the Incidental Repair Justification Form (LIWAP Technical Manual Attachment 2.7.) with an explanation for their need and the associated relationship to a specific cost effective weatherization measure or group of measures. Incidental repairs, as defined in 10 CFR 440, means those repairs necessary for the effective performance or preservation of weatherization materials. The Incidental Repair Cost Limit for site-built and mobile homes is \$600 in materials. A subgrantee is required to request prior approval from DED/DE for any incidental repairs requiring more than \$600 in materials before commencing work on the project. The request and approval/disapproval documentation should be uploaded to the MoWAP client file. Refer to LIWAP Technical Manual Section XII, Subsection C: Incidental Repairs for additional information.

## **4. Health and Safety Cost Limits**

A statewide limit for the average cost per home for Health and Safety abatement costs has been set at twenty percent (20%) of program operation expenditures. DED/DE recognizes that some hazards will be beyond the scope of the resources of the program to abate. Dwellings that contain such hazards will be deferred if a serious hazard is likely to be aggravated by the weatherization process or cause harm to the technicians working on the home. If conditions are found that endanger the occupants and are beyond the scope of the WAP, a subgrantee should take whatever actions necessary to inform the occupants and appropriate authorities. Additional health and safety information is available in the

Weatherization Master File under Health and Safety Plans (See Appendix A of this manual).

## 5. Minimum Material and Labor Expenditures per Funding Source

It is required that a minimum of **\$100 in labor/material expenditures per unit** must reported on a DOE reimbursement. Exceptions to this policy will be allowed for end of grant reimbursements or other special circumstances pre-approved by DED/DE on a case-by case basis. **Please remember that all units reported to DED/DE for reimbursement must be split funded with DOE funds.** (See Section 3, page 1)

When split funding units with two or more funding sources that DED/DE administers, it is required that a minimum of **10% in labor/material expenditures per unit** must be charged to each of the **non-DOE** fund sources that the unit is being split with. Exceptions to this policy will be allowed for end of grant reimbursements or other special circumstances pre-approved by DED/DE on a case-by case basis.

## II. Funding

### A. Subgrant Advance

The purpose of advance funding is to provide funds to cover the lag between the time a subgrantee incurs an expense and is reimbursed by the State. DED/DE may withhold reimbursement requests in order to liquidate the advance. All advances must be fully expended by the end of the grant period in which the advance was requested. Advancements must be requested through MoWAP.

### B. Subgrant Advance Policy

The actual amount of advance funding will be based on the amount of expenditures the subgrantee expects to make in the first 60 days of the grant period. The initial advance will be reconciled with actual expenditures within the first 90 days of the grant period. However, this does not preclude the subgrantee from submitting additional advance funding requests after the initial advance has been at least 66.7% reconciled with actual expenditures. Any subsequent advance funding requests must be in 60 day or less increments, and must be reconciled with actual expenditures on or before the next 90 days of the grant period. No ensuing advance funding requests will be approved until the previous request has been at least 66.7% reconciled with actual expenditures. A less restrictive reconciliation schedule may be considered by DED/DE on a case by case basis. There must be a zero agency fund balance (i.e., a full reconciliation of advances to expenditures) at the end of the grant period. Also, please be aware that advance funding is subject to federal cash management rules that can be found in 2 CFR 200.305. Required documentation for upfront funding must be uploaded to the advancement request on MoWAP. The following are the basic requirements that must be followed:

- a) If advance funding is authorized, those funds must be deposited into an insured, interest bearing account.
- b) Advance funding requests cannot exceed twenty-five (25%) of the total grant amount unless the recipient demonstrates good cause.

- c) Recipients of advance funding must maintain or demonstrate the willingness to maintain written procedures that minimize the time elapsing between the transfer of funds and disbursement by the subgrantee and that the subgrantees have financial systems that meets standards for fund control and accountability.
- d) The timing of cash advances shall be as close as administratively feasible to the actual disbursements by the subgrantee.
- e) Interest would be earned from the day the advance is deposited until it is withdrawn to make a payment and if any advance funding remains after payment (positive cash balance) it will continue to draw interest until it is withdrawn for another payment.
- f) If interest earned on the advance exceeds the dollar threshold established in 2 CFR 200.305 (\$500) it must be repaid to the federal Department of Health and Human Services.
- g) The initial advance will be reconciled with actual expenditures within the first 90 days of the grant period. Any subsequent advance funding requests must be in 60 day or less increments, and must be reconciled with actual expenditures on or before the next 90 days of the grant period. No advance funding requests will be approved until the previous request has been at least 66.7% reconciled with actual expenditures. There must be a zero agency fund balance (i.e., a full reconciliation of advances to expenditures) at the end of at the end of the grant period.
- h) Reconciliation of the advance funding will begin the first month of the 90 day (three months) reconciliation cycle. Payment requests will be reduced by 33.3% of the advance funding amount in the first month, 33.3% in the second month and the remaining 33.4% in the third month of the 90 day reconciliation cycle. If payment requests do not cover the advance funding amount, then payment requests will not be paid until the advance can be reconciled with actual expenditures.

To support the amount of requested advance funding, the following documentation must accompany each request:

- Vehicles and Equipment – Submit bid documentation and copies of approval letters from DOE and DED/DE for all vehicle purchases or equipment that costs over \$5,000 per unit, for the expected purchases that will be completed during the period for which advance funding is being requested. In addition, provide information regarding the number of vehicles the agency plans to keep (year and approx. miles), those the agency plans to get rid of (year/miles), number of existing staff and number of new hires to show the need for the additional vehicles.
- Training – Submit type of training, cost, and employee(s) or contractor(s) that will be attending training during the period for which advance funding is being requested.



- Names and addresses of the homes that will be weatherized during the period for which advance funding is being requested.
- Dates when weatherization work is scheduled to begin on each of the homes.
- If energy assessments have been performed on the homes, include the projected cost of completing the weatherization work. Costs should include support, materials and labor.
- Additional space costs – Submit copy of lease/rent or space allocation agreement.
- Any additional documentation that the agency considers important to support the request for advance funding.
- Written procedures that outline advance funding requirements in accordance with 2 CFR 200.305.

Advance funding requests are to be completed through the MoWAP system. This is done through the Advancements Screen which can be accessed from the main menu. Supporting documentation for the advancement must be uploaded on the Advancements Screen through MoWAP.

### **C. Reimbursement**

The intent of DED/DE is to process reimbursements in a timely manner if proper documentation is submitted.

The State's preferred method of payment is reimbursement.

Reimbursement requests shall be submitted through MoWAP. (See Section 3 of this manual for reporting requirements) Reimbursement reporting requirements include uploading the general ledger/working papers for support cost documentation. The expenditures on the reimbursement and the general ledger/working papers must be reviewed to ensure that they are allowable per grant guidelines. The expenditures on the reimbursement must be posted to the general ledger/working papers. The total on the general ledger/working papers **must** match the total expenditures on the MoWAP reimbursement. Any reason for variances must be noted on the general ledger/working papers. The general ledger/working papers should include references to the homes attached on the reimbursement, and include contract labor, crew labor, and materials. This **must** match the MoWAP reimbursement.

Upon receipt of the reimbursement request, DED/DE shall perform an analysis of the request and shall initiate reimbursement procedures. The purpose of the analysis is to review revenue and expense categories and identify significant variances from the subgrant budget as well as non-compliance with expense and revenue limits. Client files reported on reimbursement requests are reviewed to ensure compliance with WAP program rules and technical standards. (See attachment 1-4: MoWAP Client File Review and Reimbursement Checklist)

Any corrections or revisions noted by DED/DE staff that need to be completed by the



weatherization agency before reimbursement can be authorized will be relayed to the agency through MoWAP and email, and documented in the agency monthly report files.

Once DED/DE's review is complete and reimbursement approved, DED/DE staff will enter and approve reimbursement requests in the SAM II state accounting system for payment.

Agencies must ensure a zero agency fund balance at the end of the grant period, meaning advances must be reconciled to zero. DED/DE will withhold approving reimbursements during the fourth quarter until the agency reconciles their advance fund balance to zero.

### **III. Weatherization Funded Asset Management**

#### **A. Inventory**

Materials inventory shall be valued on the Agency's Balance Sheet using the First In First Out (FIFO) inventory valuation method.

Agencies may choose either the perpetual or periodic inventory system. If the perpetual system is chosen, the agency must record the results of a reconciliation between a physical inventory and the general ledger carrying value of the inventory at the end of the Program Year. This documentation should be kept in agency weatherization files in the event monitors/auditors want to review that information.

#### **B. Equipment**

Reportable equipment and vehicles are defined as equipment with a cost equal to or greater than \$5,000.

The agency must insure its equipment in accordance with the provisions of 2 CFR 200.

DED/DE requires an annual equipment inventory. The results of the annual inventory are due to DED/DE not later than December 1 of the current Program Year. (See Section 5, Procurement Attachments, for the Vehicle and Equipment Inventory Form)

Sale of Equipment/Property Disposition. (See Section 5, Procurement, subsection III, Part D)

### **IV. Closeout of Weatherization Program Years**

Subgrantees may only report homes as completed that have all work and a fully passed final inspection completed by the end date of the grant period specified in the Terms of Grant Agreement. Only services or supplies received prior to the end of the Program Year will be reimbursed by DED/DE (i.e., services, office supplies). DED/DE will not reimburse the cost of any material inventory or for homes in progress.

### **V. Final Reimbursements and Audits**

#### **A. Final Reimbursements**

Authority to spend subgrant funds is for a specific time period. The final reimbursement must document expenditures as of the last day of the month of the end of the grant period.

Each subgrantee must submit an accurate final reimbursement within 30 days following the end of the grant period.

**B. Audits** (See Attachment 4-2)

A complete audit report is due to DED/DE within nine months from the end of the agency's fiscal year or thirty days from the date the final report is submitted to the recipient by the independent auditor.

All figures on the final report are subject to auditor confirmation. A copy of the agency single audit shall be submitted to DED/DE. See the WAP audit guide for guidance concerning agency single audits. All accounts payable must be liquidated. Subgrants will not be considered concluded until the State sends the subgrantee an audit review letter and a management decision letter, if applicable. **Discrepancies between the final report and the auditor prepared schedules in the audit report have to be reconciled prior to submission otherwise the audit report will be forwarded to the agency's Board of Directors for corrective action.**

**VI. Program Income**

DOE defines program income as any funds earned by grantees and/or subgrantees from non-federal sources during the course of performing DOE Weatherization work. The income generated must be used to complete additional dwelling units in accordance with U.S. DOE rules.

Program income is subject to the specific guidance provided in 2 CFR 200.307, and should be treated as an addition to program funds and are subject to the same rules as appropriated funds. DOE will stipulate, in the grant award, that program income is to be treated as an addition to program funds. Property owner (i.e. landlord) contributions and leveraged resources (i.e. utility or State funds) are NOT considered to be "program income" for the purposes of the Weatherization Assistance Program.

**VII. Terminology Definitions**

Beginning Fund Balance: Funds that have been advanced but not expensed from the previous grant.

Ending Fund Balance: The sum of the Beginning Fund Balance + Grant Income + Program Income – minus total Expenditures. This is the Total Reimbursed field on the MoWAP Reimbursement/Advancement screen.

Grant Balance: The total agency grant amount, minus reimbursable expenditures. This is the "Available" field on the MoWAP Reimbursement/Advancement screen.

Reimbursable Expenditures: Allowable costs incurred by the agency within the specified program year. This is the, "Current Expenditures" field as displayed on the MoWAP Reimbursement screen.

Report Month: The recorded month reported on a reimbursement through MoWAP. Agencies may choose either the current or immediately previous month when reporting reimbursement information through MoWAP.

(See MoWAP Agency User Manual for additional MoWAP definitions.)